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INFORMAL NOTE

To: Michael Murphy, USEPA, Region V

From: Melda Rafferty, DOE Portsmouth Gaseous Diffusion Plant

Enclosed for your information is a copy of the monthly status report on the NESHAPS audit findings from your March 16-19, 1993 inspection. Hope you find the report informative. Call me if you want to discuss any of our corrective actions. Look forward to hearing from you.

Monthly Status Report on NESHAP Audit Findings

Finding (1) - Reconfiguration of Sampling Lines

Status: An Instrumentation Engineering and Chemical Technology Team will examine the design of the sampling lines by March 1, 1994, and assess the feasibility of further minimizing line bends without adversely impacting the trap changeout procedures.

Depending on the results of this assessment, plans for line replacement and/or modification, where deemed to consist of an improvement, will be developed by April 1, 1994.

Line configuration changes determined to be desirable will be implemented; a completion date is contingent upon the nature and extent of the changes, and cannot be projected at this time.

Finding (2) - Personnel Shortage

Status: A requisition for an additional person to the vent sampling group will be initiated January 31, 1994. Staff interviews, hiring/transfer, and training should be completed by August 1994 and should strengthen capability/backup of the vent sampling group.

Two individuals of the vent sampling group will be scheduled to take EPA NESHAP training courses at the earliest possible date to broaden the expertise of existing staff in the essentials of stack sampling.

A training module for the vent sampling systems is being developed and should be completed by August 1994 to assure trained backup personnel are available to support primary personnel in vent sampling activities.

Findings (5 & 6) - Calibration Procedures and Calibration Tags

Status: TSD-523-004 (later superseded by TSD-532-004) specified a rigid annual calibration schedule that was deemed too difficult to fully comply with because of hazardous work permit or other conditions that may prevent planned entry to vent sampler locations on a given date.

Procedure TSD-532-004 (formerly TSD-523-004), Operational Procedures for the Continuous Vent Stack Samplers, will be revised to reflect more recently defined recalibration schedules, uniform protocols for systems where practical and consistency with other vent sampler operating procedures, such as TSD-532-015. Completion date for revision is May 1994.

Stack flow measurement units at sampling locations 12, 13, 14, 15 and 16 are the most recent installations and employ an insertion type of mass flowmeter which was not adequately addressed in TSD-532-004 (formerly TSD-523-004). Recalibration or verification procedures for these units are being developed with an anticipated issue date of July 1994.

Finding (7) - X-333 BE and X-345 HASA Mass Flowmeter Calibration Protocol

Status: Calibration of the two mass flowmeters X-333 BE and X-345 HASA was completed on 3/30/93 and 3/31/93.

Procedure TSD-532-015, Calibration Schedule for Flow Measurement Devices of the Continuous Vent Stack Samplers, was issued May 15, 1993. This procedure specifies revised recalibration schedules as noted under Findings (5 & 6) and is being reviewed to assure protocol consistency and interpretation with TSD-532-004 (formerly TSD-523-004). A completion date of May 1994 is anticipated.

Procedure TSD-532-004 (formerly TSD-523-004), Operational Procedures for the Continuous Vent Stack Samplers, will be revised to reflect the recalibration schedule detailed in TSD-532-015 and to ensure appropriate agreement, protocol consistency and interpretation with other operating procedures that pertain to some aspect of the continuous vent stack samplers. Completion date for this revision is May 1994.

Finding (8) - Marking and Identification Placement on Flowmeter Components

Status: Flowmeter components are marked with the serial numbers or unique instruments numbers used for tracking and identification. This finding has been resolved and is considered closed.

Findings (10) (12) & (13) - Urinalysis, Environmental Samples, & Air Filter Counting Documentation

Status: Tennelec maintenance logbooks have no entries of repeated high background followed by an entry of window replacement in the June to October 1992 timeframe cited by the USEPA. However, the logbook of one of our three instruments in service at that time shows the high background notations from June through october 1991 and a damaged window replaced in January 1992, as noted in our original response. Therefore, our original response discussed the only two instances in which we are aware that there were long periods of high background entries followed by a later entry of replacement of a damaged window. As noted in our initial response, the high background entries over a several-month period were totally unrelated to the subsequent window damage, which was detected and corrected immediately upon occurrence.

Corrective action taken was as follows:

1. Although window damage (and replacement prior to use of the counting instrument) still occurs periodically, the frequency of such incidents has been significantly reduced by applying spray adhesive to Health Physics smear samples, which aids in preventing their disengagement from planchets during counting and making damaging contact with windows.

2. An improved statistical method of determining background acceptance criteria has been implemented.

3. Counseling sessions have been held with laboratory personnel on the need for clear and pertinent maintenance logbook entries.

We believe that the actions taken with regard to the cited EPA findings close these items.

Finding (16) - Documentation Evaluation for Sample 7794-54-6-110

Status: The Tri-carb liquid scintillation counter has been programmed to include an instrument tracking number on the instrument printout. That tracking number also appears on the laboratory benchsheet where it is associated with the instrument serial number.

We feel that the actions taken with regard to the cited EPA finding, closes this item.